## Case 2:11-cv-01492-LDG-GWF Document 19 Filed 11/17/11 Page 1 of 2 1 Kym S. Cushing, Esq. Nevada Bar No. 4242 2 Aryn M. Fitzwater, Esq. Nevada Bar No. 8802 3 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP 300 South 4th Street, 11th Floor 4 Las Vegas, NV 89101 5 Tel.: (702) 727-1400 Fax: (702) 727-1401 6 Kym.Cushing@wilsonelser.com Aryn.Fitzwater@wilsonelser.com 7 Attorneys for Defendant LIFE INSURANCE COMPANY 8 OF NORTH AMERICA 9 Jesse M. Sbaih, Esq. Ines Olevic-Saleh, Esq. 10 JESSE SBAIH & ASSOCIATES, LTD. The District at Green Valley Ranch 11 170 S. Green Valley Pkwy., Suite 280 Henderson, Nevada 89012 12 702-896-2529 702-896-0529 fax 13 Attorneys for Plaintiff ISAM ÁBUNADI 14 UNITED STATES DISTRICT COURT 15 16 DISTRICT OF NEVADA 17 CASE NO. 2:11-cy-01492-LDG-GWF ISAM ABUNADI, 18 Plaintiff, 19 STIPULATION OF THE PARTIES v. FOR AN ORDER STAYING 20 PROCEEDINGS FOR 90 DAYS LIFE INSURANCE COMPANY OF NORTH AMERICA doing business as CIGNA GROUP 21 INSURANCE, DOES I to X, inclusive, 22 Defendants. 23 24 Plaintiff Isam Abunadi ("Plaintiff") and Defendant Life Insurance Company of North 25 America ("LINA"), erroneously sued herein as "Life Insurance Company of North America doing 26 business as CIGNA Group Insurance (Plaintiff and LINA referred to hereinafter as "the Parties"), by 27 and through their respective undersigned counsel of record, hereby submit the following stipulation 28 for an order staying proceedings for 90 days for good cause as follows:

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1 LINA is in the process of adjudicating plaintiffs claims for benefits. Therefore, LINA has 2 asserted that Plaintiff's lawsuit is not ripe. On the other hand, Plaintiff contends that the lawsuit is 3 indeed ripe. 4 Nonetheless, at this time, the Parties have stipulated to a 90 day continuance of the 5 proceedings to give LINA time to conclude its review of the claims, and if necessary, conduct an 6 appeal of the decision. The Parties believe a stay of proceedings will preserve both litigation and 7 judicial resources. Therefore, the Parties respectfully request that this Court issue an order staying 8 the proceedings for 90 days from the date of said order. 9 RESPECTFULLY SUBMITTED: 10 DATED this 7<sup>th</sup> day of November, 2011. 11 DATED this 7<sup>th</sup> day of November, 2011. 12 WILSON, ELSER, MOSKOWITZ, JESSE SBAIH & ASSOCIATES, LTD. 13 EDELMAN & DICKER LLP 14 /s/ Jesse M. Sbaih\_ /s/ Aryn M. Fitzwater\_ JESSE M. SBAIH, ESQ. 15 **KYM CUSHING** Nevada Bar No. 7898 Nevada Bar No. 4242 Ines Olevic-Saleh 16 ARYN M. FITZWATER Nevada Bar No. 11431 Nevada Bar No. 8802 300 South 4th Street, 11th Floor The District at Green Valley Ranch 17 170 S. Green Valley Pkwy., Suite 280 Las Vegas, NV 89101-6014 Henderson, Nevada 89012 18 (702) 727-1400; Fax (702) 727-1401 Michael.Edwards@wilsonelser.com 702-896-2529 702-896-0529 fax Aryn.Fitzwater@wilsonelser.com 19 Attorneys for Defendants 20 Life Insurance Company of North America and National Employee Benefit 21 Companies, Inc. 22 23 IT IS SO ORDERED: 24 25

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